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Attorneys for Defendant NAVIENT SOLUTIONS, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION

Jason Cordero,

Plaintiff,

vs.

Navient Solutions, LLC,

Defendant.

Case No. **5:18-cv-01118- R-JEM**

(Honorable Manuel L. Real,
Courtroom "880")

**STIPULATION AND REQUEST
FOR STAY OF PROCEEDINGS
PENDING ARBITRATION**

Complaint Filed: 5/25/18
Motion Cut-Off: Not Set
Discovery Cut-Off: Not Set

**TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD
HEREIN:**

Plaintiff Jason Cordero (“Plaintiff”) and Defendant Navient Solutions, LLC (“NSL”), by and through their undersigned counsel, agree and stipulate to arbitrate this matter pursuant to valid arbitration agreements, and request that the Court stay the present litigation pending the resolution of the binding arbitration.

DATED: August 29, 2018

Hinshaw & Culbertson LLP

By: /s/ Elvin I. Tabah

Dennis N. Lueck, Jr.

Elvin I. Tabah

Defendant NAVIENT SOLUTIONS,
LLC

DATED: August 28, 2018

Lemberg Law, LLC

By: /s/ Trinette G. Kent

Trinette G. Kent

Attorneys for Plaintiff
JASON CORDERO

CERTIFICATE OF SERVICE

Jason Cordero vs. Navient Solutions, LLC
Case No. : 5:18-cv-01118- R-JEM

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am a citizen of the United States and employed in Los Angeles, California, at the office of a member of the bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within actions; my business address is 11601 Wilshire Blvd., Los Angeles, California 90025.

On **August 29, 2018**, I served the document(s) entitled, **STIPULATION AND REQUEST FOR STAY OF PROCEEDINGS PENDING ARBITRATION**, on the interested parties in this action by placing true copies thereof enclosed in a sealed envelope(s) addressed as stated below:

SEE ATTACHED SERVICE LIST

☒ **(BY MAIL)**: I deposited such envelope in the mail at Los Angeles, California with postage fully prepaid. I am readily familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it would be placed for collection and mailing, and deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

☐ **(VIA OVERNIGHT MAIL)**: I am "readily familiar" with the firm's practice of collection and processing correspondence for overnight delivery. Under that practice it would be deposited in a box or other facility regularly maintained by the express service carrier, or delivered to an authorized courier or driver authorized by the express service carrier to receive documents, in an envelope or package designated by the express service carrier with delivery fees paid or provided for, addressed to the person on whom it is to be served, at the office address as last given by that person on any document filed in the cause and served on the party making service; otherwise at that party's place of residence.

☐ **(BY ELECTRONIC MAIL)**: By transmitting a true copy thereof to the electronic mail addresses as indicated below.

☐ **(BY FACSIMILE)**: By transmitting an accurate copy via facsimile to the person and telephone number as stated.

☒ **(BY CM/ECF SERVICE)**: I caused such document(s) to be delivered electronically via CM/ECF as noted herein.

I declare under penalty of perjury under the laws of the United States that the above is true and correct and was executed on August 29, 2018, at Los Angeles, California.


 Robin Mojica

SERVICE LIST

Jason Cordero vs. Navient Solutions, LLC
Case No. : 5:18-cv-01118- R-JEM

VIA CM/ECF

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